

September 2, 2022

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BY CM/ECF & HAND DELIVERY

The Honorable Lewis A. Kaplan
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: ***Telecom Business Solution, LLC, et al., v. Terra Towers Corp., et al.***
Civil Action No.: 1:22-cv-01761-LAK

Your Honor:

We represent Petitioners Telecom Business Solution, LLC and LATAM Towers, LLC (collectively, “Peppertree”), Petitioner AMLQ Holdings (Cay) Ltd. (“AMLQ”), and Respondents Terra Towers Corp., TBS Management, S.A., and DT Holdings, Inc. (collectively, “Terra,” and together with Peppertree and AMLQ, the “Parties”), in the above-captioned action. We write to follow up on Peppertree and AMLQ’s August 16, 2022, letter to you (ECF No. 67) regarding the recent Second Partial Final Award (“SPFA”) issued in the underlying arbitration among the Parties. In that letter, Peppertree and AMLQ represented that the Parties would confer regarding a briefing schedule on Peppertree and AMLQ’s intended Petition to Confirm the SPFA. The Parties have since conferred, and Terra has represented that it will seek to vacate the SPFA. As such, the Parties have agreed to the following briefing schedule for their expected petitions to confirm and/or vacate the SPFA:

- September 16, 2022: Petition to Confirm and Memorandum in Support;
- October 14, 2022: Petition to Vacate and Memorandum in Support / Opposition to Petition to Confirm;
- November 11, 2022: Opposition to Petition to Vacate / Reply in Support of Petition to Confirm; and
- December 9, 2022: Reply in Support of Petition to Vacate.

Accordingly, the Parties respectfully request that the Court enter an order setting the agreed briefing schedule above in connection with the SPFA.

We thank the Court for consideration of this joint request.

Respectfully submitted,

/s/ Gregg L. Weiner
Gregg L. Weiner

Counsel for AMLQ Holdings (Cay), Ltd.

/s/ Michael N. Ungar
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CC: All Counsel of Record